

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: JOSEPH ANDREW VALENZIA a/k/a : CHAPTER 13
JOSEPH ANDREW VALENZIA, II :
Debtor :
 :
JACK N. ZAHAROPOULOS :
STANDING CHAPTER 13 TRUSTEE :
Movant :
 :
vs. :
 :
JOSEPH ANDREW VALENZIA a/k/a :
JOSEPH ANDREW VALENZIA, II :
Respondent : CASE NO. 1-21-bk-00471

OBJECTION TO DEBTOR'S EXEMPTIONS

AND NOW, this 16th day August, 2021, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the debtor's exemptions for the following reason(s):

1. Trustee objects to debtor's exemption of assets claimed under 11 U.S.C. §522(d)(12) – IRA – Clark v. Rameker, 573 U.S. 122, 134 S.Ct. 2242 (2014).

WHEREFORE, Trustee requests Your Honorable Court to sustain Trustee's Objection to Debtor's Exemptions.

Respectfully submitted,

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717)566-6097

BY: /s/James K. Jones
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 16th day August, 2021, I hereby certify that I have served the within Objection by electronically notifying parties or depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Gary Imblum, Esquire
4615 Derry Street
Harrisburg, PA 17111

/s/Deborah A. Behney
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee